

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors

PROMESA  
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**OPPOSITION TO TWENTY-FOURTH OMNIBUS OBJECTION OF THE  
COMMONWEALTH OF PUERTO RICO TO EXACT DUPLICATE CLAIMS  
PROOF OF CLAIM NUMBER 3804**

Comes now Mrs. Celeste Gómez Biamon (“Gómez Biamon”), by and through her legal representative, and very respectfully states and prays, as follows:

1. On April 4, 2018 and April 5, 2018, Gómez Biamon presented two separate proofs of claim (claim number 3804 and 3837) regarding two different actions she has against the Commonwealth of Puerto Rico (“Commonwealth”) on her behalf and in representation of her two minor children.

2. On April 15, 2019, The Commonwealth, by and through the Financial Oversight and Management Board for Puerto Rico (“Oversight Board”), filed an omnibus objection to five hundred alleged exact duplicate proofs of claim. With this omnibus objection, the Commonwealth was seeking to disallow the proofs of claims listed on Exhibit A of said document. One of the proofs of claim listed on this omnibus objection (claim number 3804) belongs to Gómez Biamon.

3. The Commonwealth argues in its omnibus objections that the holders of the

Claims to Be Disallowed will not be prejudiced by the disallowance of their claims because they will each retain a Remaining Claim against the Commonwealth. However, that is not Gómez Biamon's case, given that the two proofs of claim that she presented constitute two different and separate actions that she has against the Commonwealth on her behalf and in representation of her two minor children.

4. These actions have different plaintiffs, which include Gómez Biamon and her husband, and their two minor children. In particular, one claim is based on the Commonwealth's failure to comply with the provision of special education services to Gómez Biamon's minor child J.A.B.H., and the other claim is based on the Commonwealth's failure to comply with the provision of special education services to her other minor child J.A.B.G.

5. Please note that the documents that were attached with each proof of claim show that each claim is different and on behalf of two different minors, which is why they have different case numbers (353495428098311863 and 353491078098297804), Exhibit 1 and Exhibit 2. Additionally, in one of the documents presented with the proof of claim (titled "Reclamación"), one can see that each of the children's birth year (1999 and 2008) and their registry numbers (24342419 and 24433691) are different, Exhibit 3 and Exhibit 4. Lastly, the details of each case (included in the section titled "Breve Relato" of the document) are different.

6. As stated before, each proof of claim presented by Gómez Biamon is a different and separate action she has against the Commonwealth on her behalf and in representation of her two minor children. Therefore, they are not exact duplicates and should not be disallowed.

**WHEREFORE,** Gómez Biamon respectfully requests the Court to deny the Commonwealth's relief request in relation to her proof of claim 3804.

Respectfully submitted.

It is hereby certified that on this date, the foregoing has been electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel of record.

At San Juan, Puerto Rico, this June 10, 2019.

s/Luis E. Palou Balsa

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